

IN THE UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF MISSOURI  
SOUTHEAST DIVISION

JORDAN BLAIR,	)	
	)	
Plaintiff,	)	
	)	
vs.	)	Case No.: 1:02CV00088CAS
	)	
BOB WILLS, et al.	)	
	)	
Defendants.	)	

**JOINT PROPOSED STIPULATION OF FACTS FOR TRIAL**

The parties hereby submit their Joint Proposed Stipulation of Facts for trial:

1. Plaintiff, Jordan Michael Blair (“Blair”) was born on November 17, 1984.
2. Blair’s natural parents are Ron and Jannett Blair.
3. Mountain Park Baptist Church (“Mountain Park”) is an independent Baptist church established by Pastor Bob Wills and his wife, Betty Wills, in 1987.
4. Mountain Park’s sole ministry is to serve troubled teens through the operation of a boarding school, Mountain Park Baptist Boarding Academy. Mountain Park accepts students whose parents desire to expose their children to a fundamental, Christian Baptist environment which, through the teaching of Christ, helps to restore discipline, self-confidence, self-respect and a desire for learning.
5. In 1997, Pastor and Mrs. Wills established Palm Lane Baptist Church (“Palm Lane”) in Arcadia, Florida. Like Mountain Park, Palm Lane also ministers to teens by operating a boarding academy.
6. In October 2001, Sam Gerhardt was the assistant pastor of Mountain Park. Pastors Wills and Gerhardt made the day-to-day decisions of Mountain Park, and with its

executive administrator, Betty Wills, they managed Mountain Park. Pastor and Mrs. Wills and Pastor Gerhardt determined which students would be admitted to Mountain Park. They determined how Church funds would be expended. They also set employee schedules, had the authority to hire and fire employees, and established compensation levels.

7. In October 2001, Defendants Deborah Gerhardt, Bo Gerhardt, Julie Gerhardt, Robert O'Briant, Drew Parrish and Robert Kennedy were employees of Mountain Park and Palm Lane, and they did not have authority to hire and fire employees, and establish compensation levels.

8. Palm Lane is operated in a similar manner as Mountain Park.

9. On October 20, 2001, Ron and Jannett Blair visited Mountain Park Baptist Church and Boarding Academy ("Mountain Park"), and submitted an application to enroll Blair. Ron and Jannett Blair desired that Blair be enrolled for a term of one year.

10. On October 20, 2001, Ron and Jannett Blair were advised by Defendant Sam Gerhardt that the law in Missouri gave parents control of their children until age 17 while the law in Florida gave parents control of their children until age 18. Since Blair would turn 17 in November 2001, Defendant Sam Gerhardt explained to Ron and Jannett Blair that Blair would first be enrolled at Mountain Park then, prior to his 17<sup>th</sup> birthday, Blair would be enrolled at Palm Lane Baptist Church and Boarding Academy in Florida, an institution very similar to Mountain Park.

11. On October 24, 2001, Blair was found to have committed terroristic threatening, and he was adjudicated a delinquent by the Juvenile Court of Crawford County, Arkansas.

12. Instead of being placed in juvenile detention, the Juvenile Court ordered that Blair be placed on probation and that, as a condition of probation, Blair complete 12 months at a Baptist boys academy in Missouri or a like facility.

13. On October 24, 2001, Blair was transported to Mountain Park's campus.

14. Blair was enrolled at Mountain Park from October 24, 2001 until November 9, 2001.

15. On November 9, 2001, prior to his 17th birthday and pursuant to the October 20, 2001 discussion with Ron and Jannett Blair, Blair was transported to Palm Lane in Florida where he was enrolled. No enrollment forms were completed in connection with his enrollment at Palm Lane.

16. Blair remained at Palm Lane until March 15, 2002 when he walked away from Palm Lane staff without permission.

17. While at Mountain Park and Palm Lane, Blair was required to perform chores that included doing laundry, cleaning the dormitory, hauling firewood, taking out the trash, mowing and "weed-eating" lawns, clearing brush, painting and automobile washing and maintenance, and maintenance around the campus buildings. Occasionally, Blair may have engaged in digging a pond on the Palm Lane campus or mending some fences.

18. The students perform the chores to learn how to work as a team, and they help students develop a sense of responsibility, accomplishment, pride and confidence.

19. Chores were performed by students on a regular basis.

20. Blair was not compensated for performing the chores.

21. Blair did not produce any goods, nor work on any product, that was sold in interstate commerce.

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